

TM:WK
F. #2008R00478

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

ALBER BUKAI,
also known as "Albert Bukai"
and "Victor Bukai,"
MOUSA BUKAI,
also known as "Morris Bukai,"
and
RONALD TRAUM,

Cr. No. _____
(T. 18, U.S.C., §§
1001(a)(2), 2320(a),
2323(b), 2 and 3551 et
seq.; T. 21, U.S.C.,
§ 853(p))

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE

(Trafficking in Counterfeit Goods)

1. On or about and between March 6, 2008 and March 12, 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ALBER BUKAI, also known as "Albert Bukai" and "Victor Bukai," MOUSA BUKAI, also known as "Morris Bukai," and RONALD TRAUM, together with others, did knowingly and intentionally traffic and attempt to traffic in goods, knowingly using a counterfeit mark on and in connection with such goods.

(Title 18, United States Code, Sections 2320(a), 2 and 3551 et seq.)

COUNT TWO
(False Statement)

2. On or about March 6, 2008, within the Eastern District of New York, the defendant RONALD TRAUM did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: United States Customs and Border Protection ("CBP"), in that he falsely stated and represented to CBP Import Specialists that a DHL shipment, Entry # AEK 90998267, initially delivered to a warehouse at 167-41 147th Avenue, Jamaica, New York 11434, had subsequently been shipped out of that warehouse when in fact, as he then and there well knew and believed, it had not been shipped out of the warehouse.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 et seq.)

FORFEITURE ALLEGATION AS TO COUNT ONE

3. Upon conviction of the offense alleged in Count One of this Indictment, defendants ALBER BUKAI, also known as "Albert Bukai" and "Victor Bukai," MOUSA BUKAI, also known as "Morris Bukai," and RONALD TRAUM, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2323(b), (A) any article, the making or trafficking of which is prohibited under Title 17, United States Code, Section 506, or Title 18, United States Code, Sections 2318, 2319, 2319A, 2319B, 2320, or

chapter 90 of Title 18 United States Code, or (B) any property used, or intended to be used, in any manner or part to commit or facilitate the commission of an offense referred to in subparagraph A, or (C) any property constituting or derived from any proceeds obtained directly or indirectly as a result of an offense referred to in subparagraph A, including but not limited to the following:

(i) A sum of money representing the amount of proceeds obtained as a result of the offense;

(ii) Approximately 3,827 counterfeit/unauthorized Motorola phones, approximately 5,249 counterfeit/unauthorized Samsung phones, approximately 798 counterfeit/unauthorized Nokia phones, approximately 5,503 counterfeit/unauthorized Sony Ericsson phones, approximately 4,311 counterfeit/unauthorized LG phones, approximately 2,000 counterfeit/unauthorized Sony Ericsson headsets, approximately 2,467 counterfeit/unauthorized MP3 and MP4 players, approximately 462 boxes of counterfeit/unauthorized miscellaneous accessories, all seized from 167-41 147th Avenue, Jamaica, New York 11434 on or about and between March 11, 2008 and March 13, 2008, by law enforcement agents; and

(iii) Approximately two hundred ten thousand, nine hundred ninety dollars in United States Currency (\$210,990.00), and all proceeds traceable thereto, seized from 167-41 147th Avenue, Jamaica, New York 11434 on or about and

between March 11, 2008 and March 13, 2008, by law enforcement agents.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;
or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said

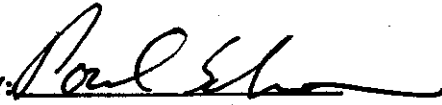
defendant(s) up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 2323(b); Title 21, United States Code, Section 853(p))

A TRUE BILL


FOREPERSON

BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

INFORMATION SHEET

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

1. Title of Case: **United States v. Alber Bukai, et al.**

2. Related Magistrate Docket Number(s): **N/A**

None ()

3. Arrest Date: **N/A**

4. Nature of offense(s): ☒ Felony
☐ Misdemeanor

5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):

6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()

7. County in which crime was allegedly committed: Queens
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

8. Has this indictment/information been ordered sealed? (X) Yes () No

9. Have arrest warrants been ordered? (X) Yes () No

**BENTON J. CAMPBELL
UNITED STATES ATTORNEY**

By: 

**Whitman G.S. Knapp
Assistant U.S. Attorney
718-254-6107**